

**UNITED STATES DISTRICT COURT  
DISTRICT COURT OF NEW JERSEY**

---

ATLAS DATA PRIVACY CORPORATION,  
as assignee of individuals who are Covered Persons,  
JANE DOE-1, a law enforcement officer, JANE  
DOE-2, a law enforcement officer, EDWIN  
MALDONADO, SCOTT MALONEY, JUSTYNA  
MALONEY, PATRICK COLLIGAN, PETER  
ANDREYEV and WILLIAM SULLIVAN,

Case No. 24-4141

Plaintiff/Counterclaim Defendant,

v.

DIGITAL SAFETY PRODUCTS, LLC, RICHARD  
ROES 1-10, fictitious names of unknown individuals  
and ABC COMPANIES 1-10, fictitious names of  
unknown entities,

Defendant/Counterclaim Plaintiff.

---

**NOTICE OF LIEN ON BEHALF OF GENOVA BURNS LLC**

PLEASE TAKE NOTICE as follows:

1. Genova Burns LLC represented Plaintiff/Atlas Data Privacy Corporation in the above matter. Genova Burns LLC no longer represents Plaintiff/Atlas Data Privacy Corporation in the above matter.
2. Genova Burns LLC hereby asserts and has a lien for legal fees and costs rendered to Plaintiffs in the above-entitled action pursuant to applicable case law. Because the firm has a lien and the amount of our share of the legal fees and costs will be determined after a recovery in this action, the defendants are put on notice that any settlement check(s) should be payable to counsel of records and Genova Burns LLC, as lienholder.
3. Further, we hereby direct that other than distributions made to Genova Burns LLC pursuant to paragraph 2 above, no other monies be paid or assets or things be provided directly to Atlas Data Privacy Corporation or Atlas Data Privacy Corporation's heirs,

attorneys, representatives, successors and assigns until the amount of our lien has been fixed by a Court Order.

Respectfully submitted,  
GENOVA BURNS LLC

BY: s/James M. Burns  
JAMES M. BURNS, ESQ.  
Genova Burns LLC  
494 Broad Street  
Newark, New Jersey 07102  
Tel: (973) 535-7101  
Fax: (973) 535-7101  
[jburns@genovaburns.com](mailto:jburns@genovaburns.com)  
*Attorney for Plaintiff/Counterclaim  
Defendant, Atlas Data Privacy Corp.*

Dated: March 13, 2025

**CERTIFICATION OF SERVICE**

On March 13, 2025, I filed the foregoing NOTICE OF LIEN with the clerk of court for the District Court, District of New Jersey, via the Court's CM/ECF system, which caused a copy of the foregoing to be served on all counsel of record.

s/James M. Burns  
JAMES M. BURNS